

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE ORLANDO GOMEZ APONTE

DEBTOR

CASE NO. 18-01896/ESL

CHAPTER 13

**DEBTOR'S REPLY TO MOTION TO DISMISS
DOCKET #30 and REQUEST FOR EXTENSION OF TIME TO CURE BALANCE ON
ASUME ARREARS**

TO THE HONORABLE COURT:

COMES NOW, JOSE ORLANDO GOMEZ APONTE, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 19, 2018, Puerto Rico's Administration for Child Support (ASUME), filed a *Motion to Dismiss*, docket #30, basically alleging that the Debtor has defaulted in the Asume payments in the amount of \$1,615.00.

2. The Debtor contacted by telephone the undersigned attorney and respectfully submits that he did incur in post-petition arrears with Asume due to certain economic problems.

3. The Debtor hereby respectfully submits that he made four (4) payments of \$323.00 for a total amount of \$1,292.00 payments to Asume to substantially cure the arrears. Attached is evidence of payments made to ASUME.

4. The Debtor is still in arrears in the sum of (\$323.00). The Debtor proposes to cure these arrears within thirty (30) days.

5. Based on the aforementioned , the Debtor respectfully requests an additional extension of time of thirty (30) days within to cure the balance owed on the Asume arrears

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Debtor's Reply to Motion to Dismiss
Case no. 18-01896/ESL13

(\$323) and inform the Court, accordingly. This extension of time to expire on February 13, 2019.

WHEREFORE, the Debtor respectfully prays this Honorable Court grant the present reply to the *Motion to Dismiss*, and grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee; Myriam Hernandez Lucena, Esq., Counsel for Asume, and also certify that I have mails by United States Postal Service copy of this motion to the following non-participant: debtor, Jose O Gomez Aponte, 4828 Roosevelt Boulevard, Philadelphia PA 19124, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 14th day of January, 2019.

/s/Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC 203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726
TEL 787-744-7699 FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

INTERNATIONAL
MONEY ORDER
164327649

FILL IN THIS STUB AND
SAVE FOR YOUR RECORD

DATE AND AMOUNT
Zahira L. Ortiz
JAN 09 2019
1323.00 11.25
P. Ortiz
Jose D. Gomez

DETACH HERE

PURCHASER'S RECEIPT

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164327649 3

NOT VALID OVER FIVE HUNDRED U.S. DOLLARS

PAY TO THE ORDER OF **ONLY** **THREE HUNDRED TWENTY THREE DOLLARS AND 00 CENTS**

SN-0164327649 LOC# 10367 STORE-1 04-1

***** JAN 09 2019 *****

PAY TO THE ORDER OF **Zahira L. Ortiz** **VOID OVER \$ 323.00**

Jose D. Gomez **1001413703-7** **0050 0321153-5**

PURCHASER SIGN FOR DRAWER

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PAY TO THE ORDER OF *Lahira L Ortiz Marrero* **ADMINISTRACIÓN SUSTENTO HUANZ**

VOID OVER *1,353.00*

PURCHASER SIGNATURE *Jose D. Lopez* **ADDRESS** *0321153-3*

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NOT VALID OVER FIVE HUNDRED US DOLLARS

PAY TO THE ORDER OF *Zahira / Mike Perez / Administración Estatal Nueva*

VOID OVER \$ 323.00

Jose D. Gomez *Harte Case 032133-3* *Philadelphia, PA*

PURCHASER SIGNATURE FOR CASH

ADDRESS *0801413163*

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Valid Money Order includes: 1. Heat sensitive, red stop sign AND 2. Contains a True Watermark hold up to light to view.

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To Validate: Touch the stop sign, then watch it fade and reappear

\$ 323.00

THREE HUNDRED **
TWENTY-THREE ***
DOLLARS 00 CENTS

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Payable Through
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ISSUER/DRAWER:
MONEYGRAM PAYMENT SYSTEMS, INC.

Payable To:
Administración Sustento Menores
(ASUMTE) Zahiria L Ortiz Morales
Pension Mes Diciembre 2018
Jose Gomez Ante Pension Pinar
PURCHASER, SIGNER FOR DRAWER / COMPRADOR, FIRMA DEL LIBRADOR
PURCHASER, BY SIGNING YOU AGREE TO THE SERVICE CHARGE AND OTHER TERMS ON THE REVERSE SIDE

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